

JL:DSM
F.# 2000R00248

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M-08-243

- - - - -X

UNITED STATES OF AMERICA

- against -

CHRISTOPHER CURANOVIC,

SEALED COMPLAINT AND
AFFIDAVIT IN SUPPORT OF
AN ARREST WARRANT

(T. 18, U.S.C., § 1951)

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

ERIC J. REESE, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), duly appointed according to law and acting as such.

Upon information and belief, in or about May 2006, within the Eastern District of New York and elsewhere, the defendant CHRISTOPHER CURANOVIC, together with others, did knowingly and intentionally conspire to obstruct, delay and affect commerce and the movement of any article or commodity in commerce, by robbery of a drug trafficker, and did threaten and commit physical violence to a person in furtherance of that plan.

(Title 18, United States Code, Section 1951(a)).

The source of your deponent's information and the grounds for his belief are as follows:^{1/}

^{1/} Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not set forth all of the facts and circumstances of which I am aware.

1. Your deponent is currently assigned to the FBI Balkan Organized Crime Squad in New York. I am familiar with the facts contained in this affidavit as a result of my participation in the investigation of the robbery described below, including reviewing records, interviewing witnesses, reviewing surveillance footage, and speaking with other law enforcement personnel.

2. Where the contents of documents, the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

3. According to a cooperating witness ("CW-1")^{2/}, in or about May 2006, the defendant CHRISTOPHER CURANOVIC agreed with others to participate in a home invasion robbery of a drug trafficker's residence in the area of Los Angeles, California.

4. According to CW-1, in or about May 2006, the defendant CHRISTOPHER CURANOVIC and a co-conspirator ("CC-1") went to John F. Kennedy International Airport ("JFK Airport") in Queens, New York and flew from there to Los Angeles, California.

5. Credit card and airline records confirm that on or about May 18, 2006, the defendant CHRISTOPHER CURANOVIC and CC-1

^{2/} After being arrested and charged in the Eastern District of New York with a felony, CW-1 entered into a cooperation agreement with the government. Pursuant to this agreement, CW-1 has pled guilty and is awaiting sentencing. In exchange for his cooperation, CW-1 hopes to receive a 5K.1 letter from the government at the time of his sentencing and also hopes to be relocated for his security following completion of his cooperation.

traveled from JFK Airport in Queens, New York to Los Angeles, California.

6. According to CW-1, in or about May 2006, the defendant CHRISTOPHER CURANOVIC and CC-1 went to the drug trafficker's residence, identified themselves as law enforcement agents, and gained entry to the residence. The defendant had a firearm. The defendant hit a female occupant of the residence in the head with the firearm.

7. A 911 call received by the Burbank Police Department corroborates that a home invasion occurred on May 19, 2006. A female caller ("V-1") described that two white males posing as law enforcement agents came to her house telling her that they had a warrant. V-1 indicated that the males had badges and "DEA" shirts. Further, V-1 stated that she was hit in the head by one of the intruders.

8. Your deponent along with another agent of the FBI interviewed V-1. V-1 stated that she was hit in the head with a handgun. Further, V-1's description of the two white males generally matches the defendant CHRISTOPHER CURANOVIC and CC-1.

9. Your deponent interviewed a witness ("W-1") who observed a portion of the events of May 19, 2006. W-1 stated that he observed two white males wearing shirts with "DEA" lettering approach the above-described residence.

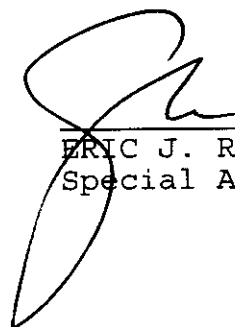
10. Video surveillance from the Los Angeles International Airport confirms that on May 19, 2006, the defendant CHRISTOPHER CURANOVIC and CC-1 were present in the

airport and airline records confirm that they flew back to JFK Airport in Queens, New York.

11. Further, cellular telephone tower and sector records for telephones known to be used by the defendant CHRISTOPHER CURANOVIC corroborate the above-described account of the defendant's whereabouts on or about May 18-19, 2006.

WHEREFORE, your deponent respectfully requests that an arrest warrant be issued for the defendant CHRISTOPHER CURANOVIC, so that he may be dealt with according to law.

WHEREFORE, I further request that this affidavit be sealed until further order of the Court.



ERIC J. REESE
Special Agent, FBI

Sworn to before me this
12th day of March, 2008

UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK